

**IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND**

CRYSTAL SPRADLIN \*  
as mother and next friend of \*  
A. \*  
9215 Links Road \*  
Walkersville, MD 21793 \*

Plaintiffs \*

v. \*

FREDERICK COUNTY PUBLIC SCHOOLS\*  
191 South East Street  
Frederick, MD 21701

C-10-CV-23-000551

\* Case No.: \_\_\_\_\_

and \*

STRAWBRIDGE SCHOOL \*  
3300 Gaither Road \*  
Baltimore, MD 21244 \*

Defendants \*

\* \* \* \* \*

**COMPLAINT**

COMES NOW the Plaintiff, CRYSTAL SPRADLIN as mother and next friend of A. (whose name has been replaced for privacy purposes), by and through counsel, Campen & Manganaro, and states and complains against the Defendants, Frederick County Public Schools (“FCPS”) and Strawbridge School (“Strawbridge”) as follows:

**PARTIES AND FACTS**

1. At the time of the incidents alleged herein, Plaintiff, Crystal Spradlin (“Ms. Spradlin”) and her son, A. resided at 9215 Links Road, Walkersville, MD 21793.
2. Upon information and belief, at the time of the incident alleged herein, FCPS and its Board of Directors conducted business at 191 South East Street, Frederick, MD 21701.

3. Upon information and belief, at the time of the incidents alleged herein, the Strawbridge School was located at 3300 Gaither Road, Baltimore, MD 21244, being a private placement school for children with special educational needs.

4. FCPS placed A. in Strawbridge School as a non-public placement, his attendance beginning remotely for the school year of 2019-2020, and in person starting in October of 2020.

5. On March 17<sup>th</sup>, 2022, Plaintiff A. broke his leg near the ankle in two places during a “therapeutic intervention” restraint. Video of this incident depicts A. being physically removed from his chair, without taking any harmful action towards himself or staff.

6. After the restraint A. was sent to the school nurse, who improperly diagnosed him with a sprain. Later, it would be discovered by the Centers for Advanced Orthopedics A. had a broken tibia and fibia. However, due to the misdiagnosis, A. was made to ambulate with a broken leg for the rest of the school day.

7. Immediately following the restraint Strawbridge staff called A.’s parents who were told their son’s behavior warranted restraint and that he was able to walk. However, video of A. getting onto the bus clearly indicates he could not put any weight on his right foot.

8. When A.’s mother picked him up at the bus stop, he could not walk. Since his limp did not improve, she took him to the Centers for Advanced Orthopedics in Frederick, Maryland, where an X-ray was conducted and found the fractures of his tibia and fibia.

9. Frederick County Public Schools placed A. in the Strawbridge School as a non-public placement.

10. Thus, both the Strawbridge School and Frederick County Public Schools were negligent in the training and oversight of their employees and agents.

**COUNT I – NEGLIGENCE**  
(Defendant Frederick County Public Schools)

11. Plaintiffs re-allege and incorporate herein by reference Paragraphs 1-10, inclusive of this Complaint.

12. FCPS had a duty to ensure proper placement of A. into a school that was safe with staff adequately trained on when and how to perform restraints.

13. FCPS had a duty to A. to oversee Strawbridge School such that it could ensure Strawbridge's regular business practice adhered to proper procedures regarding restraints and that restraints were conducted in a safe manner.

14. FCPS breached its duty to A. in that it failed to oversee Strawbridge School and ensure proper procedures were followed by Strawbridge School staff ensuring they were adequately trained to perform restraints.

15. FCPS's negligent oversight of Strawbridge School was without due regard to the safety of Frederick County children who were placed there and was the proximate cause of the injuries to A.

16. FCPS's negligent conduct has caused Plaintiff A's bodily injuries and emotional distress, which is serious and permanent, and has required multiple visits to physicians. In addition, Plaintiff has suffered pain and suffering, medical expenses, and economic damages as a result of his injuries and emotional distress. Further, A. will in the future incur medical expenses as a result of his injuries and emotional distress, and will on a continuing basis suffer pain and suffering and diminution of earning capacity and future economic loss.

17. FCPS's negligent conduct has caused Ms. Crystal Spradlin economic damages as a result of A.'s trauma, since A. to be home tutored and placed into a new school.

18. All of Plaintiffs' medical expenses, other economic damages, and pain and suffering and damages were caused by the negligent acts of the FCPS and Strawbridge School without the Plaintiffs contributing thereto.

WHEREFORE the Plaintiffs respectfully pray for judgment against the Defendant, Frederick County Public Schools, in an amount in excess of Seventy-Five Thousand Dollars (\$75,000) in compensatory and punitive damages, the costs of this suit and such other and further relief as this Honorable Court deems necessary.

**COUNT II – NEGLIGENCE**  
(Defendant Strawbridge School)

19. Plaintiffs reallege and incorporate herein by reference Paragraphs 1-18, inclusive, of this Complaint.

20. Strawbridge School had a duty to ensure its staff were adequately trained when and how to perform restraints, and in a safe manner that would not cause its students harm, and that policies and procedures were put in place to ensure for the safety of its students, namely A.

21. Strawbridge School breached its duty to A. in that it failed to ensure its staff were properly trained and policies and procedures were put in place that would ensure his safety.

22. Strawbridge School's negligence in training staff and setting proper policies and procedures was without due regard to the safety of others and was the proximate cause of the injuries to Plaintiffs.

23. Strawbridge School's negligent conduct has caused Plaintiff A's bodily injuries and emotional distress, some of which are serious and permanent, and have required multiple visits to physicians. In addition, Plaintiff A. has suffered pain and suffering, medical expenses, and economic damages as a result of his injuries. Further, A. will in the future incur medical expenses as a result of

his injuries and emotional distress, and will on a continuing basis suffer pain and suffering and diminution of earning capacity and future economic loss.

24. Strawbridge School's negligent conduct has caused Ms. Crystal Spradlin economic damages as a result of A.'s trauma, requiring him to be home-tutored and placed into a new school.

25. All of Plaintiffs' medical expenses, other economic damages, and pain and suffering damages were caused by the negligent acts of the FCPS and Strawbridge School without the Plaintiffs contributing thereto.

WHEREFORE the Plaintiffs respectfully pray for judgment against the Defendant, Strawbridge School, in an amount in excess of Seventy-Five Thousand Dollars (\$75,000) in compensatory and punitive damages, the costs of this suit and such other and further relief as this Honorable Court deems necessary.

**COUNT III – 4<sup>th</sup> AMENDMENT VIOLATION – UNDER 42 USC CODE § 1983**  
(Defendant FCPS)

26. Plaintiffs reallege and incorporate herein by reference Paragraphs 1-25, inclusive, of this Complaint.

27. FCPS had a duty to ensure Plaintiff A.'s 4<sup>th</sup> Amendment rights were not violated based on the respondeat superior doctrine.

28. A.'s right to be secure in his person and right against unreasonable seizure were violated.

29. FCPS's violation of A.'s 4<sup>th</sup> Amendment rights have caused Plaintiff A. bodily injuries and emotional distress, some of which are serious and permanent, and have required multiple visits to physicians. In addition, Plaintiff A. has suffered pain and suffering, medical expenses, and economic damages as a result of his injuries and emotional distress. Further, A. will in the future incur medical expenses as a result of his injuries and emotional distress and will on a

continuing basis suffer pain and suffering and diminution of earning capacity and future economic loss.

30. FCPS's violation of A.'s 4<sup>th</sup> Amendment rights has caused Ms. Crystal Spradlin economic damages as a result of A.'s trauma, requiring him to be home-tutored and placed into a new school.

WHEREFORE the Plaintiffs respectfully pray for judgment against the Defendant, Frederick County Public Schools, in an amount in excess of Seventy-Five Thousand Dollars (\$75,000) in compensatory and punitive damages, the costs of this suit and such other and further relief as this Honorable Court deems necessary.

Respectfully submitted,  
CAMPEL & MANGANARO

By: 

Samantha Manganaro, Esq.

3409A Urbana Pike

Frederick, Maryland 21704

P: 301-668-5808

F: 301-831-8734

E: samimanganaro@gmail.com

Client Protection Fund ID # 1312180198

*Attorneys for the Plaintiffs*

**JURY DEMAND**

Plaintiffs respectfully demand a trial by jury in the above-captioned case.

Respectfully submitted,  
CAMPEN & MANGANARO

By: 

Samantha Manganaro, Esq.  
3409A Urbana Pike  
Frederick, Maryland 21704  
P: 301-668-5808  
F: 301-831-8734  
E: samimanganaro@gmail.com  
Client Protection Fund ID # 1312180198  
*Attorneys for the Plaintiffs*